

07/15/2008 14:58 973-589-2551
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ADRIAN HUFF, as Chairman of the Board of
Trustees of TEAMSTERS LOCAL 445 FREIGHT
DIVISION PENSION FUND,

Plaintiff,

-against-

MID-HUDSON STEEL CORP., GRAMMER,
DEMPSEY & HUDSON, INC., BRIDGEPORT
STEEL CO., BUELL SPECIALTY STEEL CO.,
PABRICO STEEL FABRICATORS, INC., ELKHART
SCRAP METALS CORP., ELKHART SCRAP LIGHT
HAULING, ZINC CONSTRUCTION CORP., and
AIROTRAX, INC.,

Defendants.

Civil Action No. 07 Civ 5926
(CLB)(MDF)

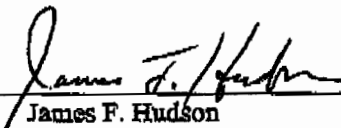
AFFIDAVIT OF JAMES F. HUDSON

JAMES F. HUDSON, being duly sworn, competent to testify, and under penalty of perjury states
as follows:

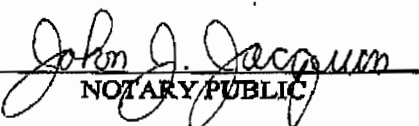
1. I was the president and partial owner of Mid-Hudson Steel Corporation.
2. At the time of the cessation of contribution to the Local 445 Freight Division Pension Fund
by Mid-Hudson Steel, the liabilities of the company exceeded the value of the assets of the
company.
3. Mid-Hudson Steel ceased operation and liquidated its assets.
4. After its liquidation, Mid-Hudson did not have funds to make payment of any liability,
including the withdrawal liability asserted by the Funds.

I do swear.

Dated: 7/15/08


James F. Hudson

Signed and sworn before me this
15 day of July, 2008.


NOTARY PUBLIC

JOHN J. JACQUIN
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Dec. 22, 2010